

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

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ILA LaFRENTZ, JIM LaFRENTZ,
KATHERINE PORTERFIELD, and
WILLIAM LaFRENTZ, Individually
and as Representatives of the
Estate of JAMES B. LaFRENTZ,

Plaintiffs,

-vs-

Civil Action No.:
4:18-cv-04229

3M COMPANY, et al.,

Defendants.

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ZOOM VIDEO DEPOSITION OF BARBARA J. HALLSTEIN

Tuesday, January 12, 2021

Reported by:

Jeannette McCormick

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1 the circumstances that we're discussing here in the
2 sampling, or is it a different time?

3 **A. I remember taking an air sample on**
4 **Mr. LaFrentz some time probably within seven years**
5 **after I started work there. I cannot attest that**
6 **it's this particular case. I don't recall this**
7 **particular air sample result that I have here.**

8 Q. So I just want to make sure I understood what
9 you said.

10 Some time possibly within with the first
11 seven years of you starting there, you do recall
12 sampling Mr. LaFrentz at some point?

13 **A. I do.**

14 Q. Do you recall what you were sampling for?

15 **A. I don't recall. It was a particulate, but**
16 **that's all I remember.**

17 Q. You agree that the document you see there,
18 the contaminant being sampled for was asbestos,
19 correct?

20 MR. NORCROSS: Objection. It calls for
21 speculation. She's told you she's not
22 familiar with the document. If you can
23 answer, go ahead.

24 THE WITNESS: I did not generate that
25 document, and I'm not sure who did generate

1 it or who filled it out.

2 BY MR. PEEK:

3 Q. But taking the document for what it is as it
4 sits there, that particular document says that
5 asbestos was the contaminant being sampled for,
6 correct?

7 MR. NORCROSS: Objection. Calls for
8 speculation. She's told you she is not
9 familiar with the document, Brad. She didn't
10 create it.

11 THE WITNESS: Yeah, I didn't create this
12 document. I'm not actually sure who created
13 the document, and I haven't seen it until
14 just recently.

15 BY MR. PEEK:

16 Q. But you would agree with me that there, the
17 contaminant, as it is listed, is asbestos,
18 regardless of where that document came from --

19 MR. NORCROSS: Objection.

20 Q. -- it does actually say asbestos, correct?

21 MR. NORCROSS: Objection. Calls for
22 speculation, and it's a compound question.
23 Are you asking her if the document says the
24 word asbestos on it? Are you calling -- I'm
25 not clear, and I don't think she's clear, on

1 **asbestos. That's my recollection.**

2 Q. Did you do any fiber counting?

3 **A. No.**

4 Q. Have you ever done any fiber counting?

5 **A. Not that I remember.**

6 Q. And so your role, tell me -- in the sampling
7 of asbestos at General Dynamics, explain to me, if
8 you can, the starting point to the ending point of
9 your role in developing a report like that and how
10 you got the information on it.

11 **A. Okay. So --**

12 MR. NORCROSS: Objection as vague and
13 ambiguous. If you understand the question,
14 you can answer it.

15 THE WITNESS: No. Can you ask me that
16 again?

17 BY MR. PEEK:

18 Q. I just want to know the detail step-by-step
19 of your role in the air sampling that was utilized
20 for someone to develop a report like the one we're
21 discussing.

22 **A. We would know what we were sampling for, pick**
23 **an appropriate media, and take an air sample,**
24 **depending on, you know, different factors or**
25 **whatever, how long an operation was or whatever;**